

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

2020 MAR 10 A 11: 33

CLERK OF COURT

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 20-CR-
[18 U.S.C. § 2252A(a)(5)(B)]

THOMAS P. SCHOENHARR,

20-CR-062

Defendant.

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES:

1. On or about March 21, 2017, in the State and Eastern District of Wisconsin,

THOMAS P. SCHOENHARR

knowingly possessed material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been shipped and transported using any means and facility of interstate and foreign commerce, and that was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, including by computer.

2. The child pornography possessed by the defendant included images involving a minor who had not attained 12 years of age and includes the following two file names:

File Name	Description
Carved [670430362].jpeg	This file depicts a collage of 20 photos showing a minor female, approximately 8-10 years of age, performing various sex acts with an adult male. The minor female is naked in all the images. One image shows the minor female blindfolded, with her hands bound, and as she is standing on her knees, an erect penis is situated next to her mouth. In five images, the minor female is shown in an act of fellatio. In one image, the minor female is shown with an object inserted into her vagina while her hands are bound to her legs, and in one image the minor is shown with a male penis in her vagina.
Carved [700597626].jpeg	This file depicts a collage of 19 photos showing a naked minor female, approximately 5 to 6 years of age, performing various sex acts with an adult male. Fourteen images show the naked lower torso of the minor including the legs, buttocks, and vagina. Three images show a penis inserted in the anus of the minor. One image shows a finger touching the vagina of the minor.

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).

FORFEITURE ALLEGATION

3. That, upon conviction for a violation of Title 18, United States Code, Section 2252A, set forth above, the defendant, Thomas P. Schoenharr, shall forfeit to the United States of America the following:

- a. Any visual depiction described in Title 18, United States Code, Section 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of such offense;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such an offense; and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, including but not limited to the following items seized on or around March 21, 2017: One Dell Desktop Computer, model XPS 8300, with serial number DSPNJQ1.

4. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

Dated: March 10th, 2020


MATTHEW D. KRUEGER
United States Attorney